

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,
Plaintiffs,

vs.

COLLINS MURPHY, et al.
Defendants.

Case No.: 7:20-cv-00947

DECLARATION OF CONSTANTINOS CHRISTOFOROU

Constantinos Christoforou being duly sworn, does hereby depose and state:

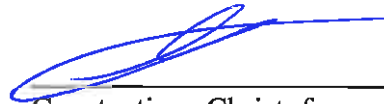
1. My name is Constantinos Christoforou. Unless otherwise stated, I make this affidavit of my own personal knowledge.
2. I am a Director of TrafficStars, Ltd. ("TL").
3. TL is incorporated in Cyprus, with its principal place of business in Limassol, Cyprus.
4. TL does not — in any way, shape, or form — own or operate the xHamster.com website.
5. TL sells advertising space for the placement of ads on the xHamster.com website.
6. Contrary to the allegations in the complaint, TL does not conduct business in the United States or South Carolina.
7. TL does not now have an office in South Carolina, nor has it ever had an office in South Carolina.
8. TL does not have an office in the United States, nor has it ever had an office in the United States.

10. TL does not have (and has never had) any employees in South Carolina or the United States.

11. TL does not maintain a bank account in South Carolina or the United States, nor has it ever had such an account.

12. TL does not pay taxes in South Carolina or the United States, nor has it ever done so.

Signed under the pains and penalties of perjury this 23 day of December, 2022.



Constantinos Christoforou, Director
TrafficStars, Ltd.